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Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”), in connection with the Court’s June 18, 2021 order directing the parties to “file a joint proposal recommending reasonable deadlines for rebuttal expert reports and the close of expert discovery.” ECF No. 6872, at 1. The Plaintiffs’ Executive Committees (“Plaintiffs”) and Defendant Dallah Avco join in this letter.

The current deadline for the parties’ joint proposal is today. The parties have exchanged proposals and have agreed to ask the Court for an additional week for further discussions. Accordingly, we respectfully request that the parties may have until August 25, 2021, to file the joint proposal directed by the Court’s previous order.

This request is without prejudice to any party’s right to make any proposal to the Court, including any proposal that any deadline be either maintained or changed in any way.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)